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Attorneys for Plaintiff EDGAR SOLIS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

EDGAR SOLIS,

Plaintiff,

v.

STATE OF CALIFORNIA; and MICHAEL BELL,

Defendant.

Case No.: 5:23-cv-00515-HDV-JPR

[Honorable Hernán D. Vera]

PLAINTIFF'S WITNESS LIST

Final Pretrial Conference:

Date: October 8, 2024

Time: 10:00 a.m.

Trial:

Date: October 29, 2024

Time: 09:00 a.m.

Place: Courtroom 10D

TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF RECORD:

Plaintiff Edgar Solis hereby serves the following list of witnesses which he may call during trial, and as a draft of the Plaintiff's Witness List. Plaintiff reserves the right to supplement and/or amend this list.

Below reflects approximate times for examination.

Respectfully Submitted,
DATED: September 10, 2024

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By: /s/ Marcel F. Sincich
Dale K. Galipo
Marcel F. Sincich
Trent C. Packer
Attorney for Plaintiff

Plaintiff's Witness List

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Edgar Solis Plaintiff	Mr. Solis will testify as to his perception of the events leading up to the shooting incident, the shooting incident, and his damages. His testify is unique as a personal account that he was not an immediate threat to any person.	45 min – 1 hr.	2 hours	
Michael Bell Defendant, Officer, California Highway Patrol	Officer Bell is likely to testify as to his perception of the incident, information known, tactics used, the deadly force used against plaintiff, and plaintiff's damages, including punitive damages. Officer Bell's testimony is unique as the defendant who used force against plaintiff.	1 hr. 15 min – 1 hr. 30 min	1 hr. 30 min.	
Patrick Sobaszek Detective, City of Hemet Police Department	Detective Sobaszek is likely to testify as to his perception of the incident, tactics used before and after the use of deadly force, and plaintiff's damages. Detective Sobaszek's testimony is unique as an eyewitness to defendant's second volley of shots, and who took the same path as defendant and plaintiff prior to the shots.	45 min	45 min.	
Arthur Paez Sergeant, City of Hemet Police Department	Sergeant Paez is likely to testify as to his perception of the incident, the tactics before and after the use of deadly force, and plaintiff's damages. Sgt. Paez's testimony is unique as the leader of the team, who sent the information about plaintiff to the team, and who witnessed the shooting of plaintiff by Deputy Waltermire.	30 – 45 min	45 min.	
Salvador Waltermire	Deputy Waltermire is likely to testify as to his perception of the incident, the tactics used before and	45 min	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Deputy, County of Riverside Sheriff's Department	after the use of deadly force, and plaintiff's damages. Deputy Waltermire's testimony is unique as an officer who used force against plaintiff prior to his flight and used deadly force against plaintiff after Defendant used deadly force against plaintiff.			
Gary Adams GLA Investigations, Plaintiff's Expert	Mr. Adams is plaintiff's investigation expert who will testify as to his scene assessment and photographs taken; observations on scene; what can and cannot be seen as demonstrated with assistant and dummy gun.	30 – 40 min	45 min	
Roger Clark Police Procedures Consultant, Inc., Plaintiff's Expert	Roger Clark is Plaintiff's single police practices expert who will testify as to his opinions rendered in this case based on his knowledge and experience in law enforcement and his review of materials in this case. Mr. Clark's testimony is unique as plaintiff's only witness to explain basic law enforcement training and the POST standards as it relates to this case, including vehicle and patrol operations, de-escalation, tactics, and the use of force and deadly force. Mr. Clark will opine on the use of deadly force standards, and the appropriateness of the use of deadly force under the circumstances of this case; hypothetical questions based on the evidence of the case; and his understanding of the forensic and physical evidence presented in this case.	1 hr.	1 hr. 30 min	
Dr. Ryan O'Connor Emergency Medical Physician, Plaintiff's Expert	Dr. O'Connor is plaintiff's sole medical expert in this case who will testify as to plaintiff's injuries, treatment, damages, pain and suffering, summary of nearly nine thousand pages of medical records, and care likely to be required in the future.	45 min – 1 hr.	45 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Balaji, Anupama, P&S non-retained expert provider	Dr. Balaji will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Agapian, John, MD non-retained expert provider	Dr. Agapian will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Downing, Stephanie, MD non-retained expert provider	Dr. Downing will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Jaden Schlig Eyewitness	Mr. Schlig will testify as to his observations on scene as an eyewitness to portions of the incident from 633 Hillmer Dr.	20 min	20 min	
Marlene Sue Biggs Eyewitness	Ms. Biggs will testify as to his observations on scene as an eyewitness to portions of the incident from 634 Hillmer Dr.	20 min	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Richard Contla Eyewitness	Mr. Contla will testify as to his observations on scene as an eyewitness to portions of the incident from 622 Taschner Dr.	20 min	30 min	
*Olin, Nicholas, MD non-retained expert provider	Dr. Olin will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Park, Heesung, MD non-retained expert provider	Dr. Olin will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Powers, Bret, DO non-retained expert provider	Dr. Powers will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Stout, Benton, PA non-retained expert provider	Dr. Stout will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and	30 min	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.			
*Custodians of Records	Custodians of records regarding Plaintiff's medical records and bills may be called is necessary to lay any foundation required.			

*Indicates that a witness will be called only if the need arises.